

Eric Bensamochan, Esq. SBN255482
The Bensamochan Law Firm, Inc.
9025 Wilshire Blvd., Suite 215
Beverly Hills, CA 90211
Tel: (818) 574-5740
Fax: (818) 961-0138
Email: eric@eblawfirm.us

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

LENA EVANS, RONI SHEMTOV, and
SHBADAN AKYLBEEKOV, individually and
on behalf of all others similarly situated,

Plaintiffs,

V.

PAYPAL,INC., a Delaware Corporation; and
DOES 1-25, inclusive,

Defendants.

Case No.:

DECLARATION OF RONI SHEMTOV

I, Roni Shemtov, do hereby declare that all of the following is true and correct to the best of my personal knowledge and if called upon as a witness I could and would competently testify to the truthfulness of all of the below statements.

1. I am a PayPal Customer who trusted PayPal to securely hold Money into my account.

2. That I used my PayPal account to sell yoga clothing on eBay.
3. That in March of 2017, my PayPal account was locked.

Declaration

4. That I made multiple attempts to reach a live PayPal employee on the phone but the only employees I reached told me my account was frozen and closed, and then hung up on me with no reason as to why my account was terminated.

5. That between March 24, 2017 and December 27, 2017, PayPal was investigating me but I did not understand why.

6. That six months later, in September of 2017, I learned that PayPal seized \$10,000 from my PayPal account.

7. That on or about November 26, 2019, I learned that PayPal seized another \$32,351.87 from my PayPal account.

8. That I did try calling PayPal and spoke with a different person on at least three different occasions. Where one person told me that I violated PayPal's Acceptable Use Policy, by using the same IP address and computer that other PayPal users used, even though I explained that I lived in a house with my family members and often more than one person uses the same computer. A different person told me that I violated PayPal's Acceptable Use Policy, by having and using multiple PayPal accounts, and a third person told me that I violated PayPal's Acceptable Use Policy, by selling my yoga clothing at 20%-30% below the retail price. Which is not true.

9. That in total \$42,737 was seized from my account and were not recovered.

10. That I was sent an IRS form dated 9/1/2020 stating that I owed taxes on this \$42,737 which they seized from me and I ended up having to pay approximately \$1,000 in taxes on the money that PayPal took from me.

11. That I was never given a copy of any investigation report or finding

12. That I relied on PayPal to conduct sales on eBay and this nearly put me out of business.

13. That I support myself and help support my family thought my online sales business and PayPal's seizure of my money made it extremely difficult to survive, especially since they did this during the Covid-19 Pandemic.

I declare under penalty of perjury under the laws of the State of California and under the laws of the United States of America that the foregoing is true and correct.

Executed this 18th day of April 2022, at Beverly Hills, California.

Roni Shemtov
Roni Shemtov

Eric Bensamochan, Esq. SBN255482
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NORTHERN DISTRICT OF CALIFORNIA**

LENA EVANS, RONI SHEMTOV, and
SHBADAN AKYLBEKOV, individually and
on behalf of all others similarly situated,
Plaintiffs,
v.
PAYPAL, INC., a Delaware Corporation; and
DOES 1-25, inclusive,
Defendants.

Case No.: 5:22-cv-00248

DECLARATION OF SHABDAN AKYLBEEKOV

I, Shabdan Akylbekov do hereby declare that all of the following is true and correct to the best of my personal knowledge and if called upon as a witness I could and would competently testify to the truthfulness of all of the below statements.

1. I am a PayPal Customer who trusted PayPal to securely hold Money in my account.

2. That I am the CEO of Hyaluron Pen Store LLC and entrepreneur who operates a real estate business. I am also married with three children.

3. That I began using Payal on May 16, 2016 opening an account for my personal use. And My wife Aigerim Tobokelova opened a separate account in the name of her wholly owned company, Azyk Logistics, Inc., in or around January 2020.

1 4. That on January 4, 2020, I began using the Azyk Logistics PayPal account for the
2 sale of Hyaluron Pens Store, a company that was created on June 12, 2020.
3

4 5. That I received payment for the Hyaluron Pens Store until March 4, 2020, after
5 which my account was limited.
6

7 6. That about 2-3 months after I started using PayPal for the sale of the Hyaluron
8 Pens Store I began hearing back from customers that they were not able to complete their
9 transaction using PayPal, and that was when I learned that PayPal had limited my account
10 without informing me.
11

12 7. That PayPal did not give me any explanation for limiting my account. I was told
13 by someone from PayPal that my funds would be held in my account for 180 days, after which
14 they would be made available for me to transfer back to my bank account.
15

16 8. That I repeatedly checked my account balance in my PayPal account from time to
17 time, and learned that on or around August 2, 2020, PayPal had seized \$172,206.43 from my
18 account without an explanation and without notifying me that the funds would be seized and
19 transferred in PayPal's account.
20

21 9. That even after calling and speaking with different PayPal customer service
22 employees over the phone, I received no explanation as to why PayPal seized the money in my
23 account. When I called them, they told me that I would still receive my funds after 180 days.
24 However after 180 days, we never heard or received anything. I called PayPal multiple times
25 asking about my funds and I was told by PayPal to send a letter to their litigation department. I
26 sent two letters to the legal department of PayPal and never received any reply either.
27

28 10. That I filed a complaint against PayPal with the Better Business Bureau, and
thereafter received a reply that claimed that Aigerim Tobokelova violated PayPal's User
Declaration
- 2 -

1 Agreement and Acceptable Use Policy by accepting payments for the sale of injectable fillers
2 that were not approved by the FDA. They claimed that the money seized was debited from her
3 PayPal account balance “for its liquidated damages arising from those AUP violations pursuant
4 to the User Agreement.”

5
6
7 11. That I never received a copy of the Acceptable Use Policy or the User Agreement
8 until PayPal limited my account and seized the monies from my PayPal Account, and transferred
9 it to PayPal’s own account, without notice or explanation.

10
11
12 12. That after discovering my account was limited, I was informed of the Acceptable
13 User Policy and was referred to a link to the Acceptable User Policy which was accessible from
14 my PayPal account.

15
16
17 13. That PayPal never returned the \$172,206.43 to my user account and claimed
18 PayPal claimed that it used these funds to reimburse customers who had purchased the Hyaluron
19 Pens, and to compensate PayPal for its damages. No customer ever told me that he or she ever
20 received a refund from PayPal.

21
22
23 14. That on May 18, 2021, letter references a customer requesting a refund because
24 the item was not received and instead of using some of the \$172,206.43 it seized, PayPal
25 demanded that I pay the customer, which I did.

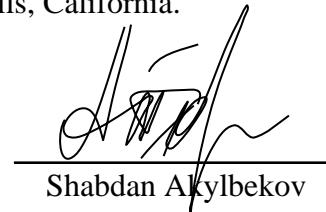
26
27
28 15. That PayPal later send a form of 1099K to Azyk Logistics, Inc., a company
16 owned by my wife, stating that the sum of \$162,517.19 was paid as the “gross amount of
17 payment third party network transactions” even though PayPal seized all of this money and
18 transferred it to PayPal’s own account, and never returned a cent of that money to my user
19 account.

1 16. That PayPal customer service supervisor told me that the documents were being
2 downloaded and would be provided to me within 2 days. To this day no documents were ever
3 given.
4

5 17. That the product that I sold never required FDA approval, as it is similar to a
6 supplement.
7

8 I declare under penalty of perjury under the laws of the State of California and under the
9 laws of the United States of America that the foregoing is true and correct.
10

11 Executed this 18th day of April 2022, at Beverly Hills, California.
12



Shabdan Akylbekov

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9
10 UNITED STATES DISTRICT COURT
11
12 NORTHERN DISTRICT OF CALIFORNIA

13 LENA EVANS, RONI SHEMTOV, and
14 SHBADAN AKYLBEEKOV, individually and
15 on behalf of all others similarly situated,

16 Plaintiffs,

17 v.

18 PAYPAL, INC., a Delaware Corporation; and
19 DOES 1-25, inclusive,

20 Defendants.

21 Case No.: 5:22-cv-00248

22 DECLARATION OF TRANG NGUYEN

23 I, Trang Nguyen, do hereby declare that all of the following is true and correct to the best
24 of my personal knowledge and if called upon as a witness I could and would competently testify
25 to the truthfulness of all of the below statements.

26 1. I am a PayPal Customer who trusted PayPal to securely hold money in my
27 account.

28 2. That PayPal permanently limited my account, holding \$5,000, which was literally
the only the only amount of money I had left to pay rent, catch up on my bills that are delinquent,
and take care of the people who depend on me.

Declaration

- 1 -

3. That because Covid I am still unable to get a job, I resorted to borrowing money from relatives, and I just applied for rental assistance.

4. That due to the hold on my funds, I am unable to pay for my rent, I have gotten fees from every account that has my name on it, including bank fees. I have lost more money, due to not having funds.

5. That I have just received a court notice to pay or be evicted from the home I have lived in for ten years.

6. That when I have tried to contact PayPal, every agent I've spoken to can't tell me why my account was limited, and they claim they cannot do anything because it is out of their hands, and I have to wait for 180 days to get an email with instructions for withdrawal.

7. That when contacted them they have left me on hold for 4 hours and was hung up on. I have even cried to the agents to try to get them to understand, but none of that means anything to them.

8. That I am dealing with so much stress from this that it is starting to impact my mental health as well.

I declare under penalty of perjury under the laws of the State of California and under the laws of the United States of America that the foregoing is true and correct. Executed this 18th day of April 2022, at Beverly Hills, California.

By: 
Trang Nguyen

Eric Bensamochan, Esq. SBN255482
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**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

LENA EVANS, RONI SHEMTOV, and
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Plaintiffs,

V.

PAYPAL,INC., a Delaware Corporation; and
DOES 1-25, inclusive,

Defendants.

Case No.: 5:22-cv-00248

DECLARATION OF MICHELLE ERWINE

I, Michelle Erwine do hereby declare that all of the following is true and correct to the best of my personal knowledge and if called upon as a witness I could and would competently testify to the truthfulness of all of the below statements.

1. I am a PayPal Customer who trusted PayPal to securely hold money in my account.

2. That in August 2021 I organized a fundraiser on my personal PayPal account for financial assistance due to Covid as well as a custody battle I was fighting.

3. That after transferring funds out of the fundraiser and into my personal account, everything was fine. Once I transferred the funds to my bank, several days later when it was to be cleared in my bank, I received notice that PayPal closed both my personal and business account due to a breach of their user agreement, however they neglected to ever inform me of what was breached. They seized \$313 which was raised in my fundraiser for my covid related financial struggles

4. That while I was trying to figure out what had happened, a customer filed a complaint with PayPal against my business for a refund of an item they did not receive. In their description, they admitted to receiving the item, but were unhappy with it. I also provided tracking to PayPal which proves they did in fact receive the item. PayPal refunded them for the purchase, claiming that I do not have seller's protection due to the limitation on my account from the breach of user agreement.

5. That PayPal is now claiming that I am using my account for gambling, but will not provide further details.

6. Now, I do not use my account for gambling, I am a single mother that just started a small business in art production.

7. That the management I spoke to on the phone told me the only way to get my money back is to take them to a small claims court, but I am a small business owner, I do not have the resources to do such.

I declare under penalty of perjury under the laws of the State of California and under the laws of the United States of America that the foregoing is true and correct. Executed this 18th day of April 2022, at Beverly Hills, California.

By: 
Michelle Erwine

Eric Bensamochan, Esq. SBN255482
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**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

LENA EVANS, RONI SHEMTOV, and
SHBADAN AKYLBEKOV, individually and
on behalf of all others similarly situated,

Plaintiffs,

V.

PAYPAL,INC., a Delaware Corporation; and
DOES 1-25, inclusive,

Defendants.

Case No.: 5:22-cv-00248

DECLARATION OF RYAN CHESMORE

I, Ryan Chesmore do hereby declare that all of the following is true and correct to the best of my personal knowledge and if called upon as a witness I could and would competently testify to the truthfulness of all of the below statements.

1. I am a PayPal Customer who trusted PayPal to securely hold money in my account.

2. That in March of 2021, PayPal decided to limit my account which held over \$1,400 of my social security money into their prepaid debit card.

Declaration

- 1 -

3. That they told me to wait 180 days to receive an email that will give me instructions on how to get my money back.

4. That I waited and then contacted corporate again via email but they would not give me any status update about my funds.

I declare under penalty of perjury under the laws of the State of California and under the laws of the United States of America that the foregoing is true and correct. Executed this 18th day of April 2022, at Beverly Hills, California.

By: 
Ryan Chesmore

Declaration

- 2 -



TITLE	My declaration
FILE NAME	Doc3.pdf
DOCUMENT ID	b50c7fc3822f0be81e3b05572a198ca170d67f5
AUDIT TRAIL DATE FORMAT	MM / DD / YYYY
STATUS	● Signed

Document History

	SENT	04 / 22 / 2022	Sent for signature to Ryan Chesmore (rolinryanc@gmail.com) from rolinryanc@gmail.com IP: 174.192.139.79
	VIEWED	04 / 22 / 2022	Viewed by Ryan Chesmore (rolinryanc@gmail.com) IP: 174.192.139.79
	SIGNED	04 / 22 / 2022	Signed by Ryan Chesmore (rolinryanc@gmail.com) IP: 174.192.139.79
	COMPLETED	04 / 22 / 2022	The document has been completed. 02:20:22 UTC

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**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

LENA EVANS, RONI SHEMTOV, and
SHBADAN AKYLBEKOV, individually and
on behalf of all others similarly situated,

Plaintiffs,

V.

PAYPAL,INC., a Delaware Corporation; and
DOES 1-25, inclusive,

Defendants.

Case No.: 5:22-cv-00248

DECLARATION OF BEN ZINO

I, Ben Zino, do hereby declare that all of the following is true and correct to the best of my personal knowledge and if called upon as a witness I could and would competently testify to the truthfulness of all of the below statements.

1. I am a PayPal customer who trusted PayPal to securely hold money in my account.

2. That I used my PayPal account to hold my money from my online business of selling toys.

3. That on June 02, 2021, my funds were seized by PayPal

4. That I contacted customer support numerous times after my account was frozen, due to high transaction volume during the holiday selling season to explain that this was a natural consequence of an online toy business. I was always told to wait the 180 days and instructions with how to close my account and move my money to the bank would be emailed to me.

5. That with no notification or explanation, PayPal stole my entire account balance. I logged in one day to discover that it was gone, and upon contacting customer support was told that this was taken in “reparation for damages caused to PayPal.”

6. That the money in my PayPal account was a critically important amount of money that I was using to pay rent and grocery bills that was stolen from me with no valid explanation, and I have not received communication from them since.

7. That \$3,307.91 of my funds were seized from my PayPal account and never given back.

I declare under penalty of perjury under the laws of the State of California and under the laws of the United States of America that the forgoing is true and correct. Executed this 20th day of April 2022, at Beverly Hills, California.

By: Ben Zino
Ben Zino

1 Eric Bensamochan, Esq. SBN255482
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8
9
10 **UNITED STATES DISTRICT COURT**
11 **NORTHERN DISTRICT OF CALIFORNIA**

12 LENA EVANS, RONI SHEMTOV, and
13 SHBADAN AKYLBEKOV, individually and
14 on behalf of all others similarly situated,
15

16 Plaintiffs,

17 v.

18 PAYOUT, INC., a Delaware Corporation; and
19 DOES 1-25, inclusive,

20 Defendants.

21 Case No.:
22

23 **DECLARATION OF ASHLEY CASEY**

24 I, Ashley Casey do hereby declare that all of the following is true and correct to the best
25 of my personal knowledge and if called upon as a witness I could and would competently testify
26 to the truthfulness of all of the below statements.

- 27 1. I am a PayPal Customer who trusted PayPal to securely hold money in my
28 account.
2. That PayPal seized \$11,000 of mine that I had deposited into my account from an
SBA loan.
3. That PayPal froze my account for 180 days and then seized it without reason

29 Declaration re: Request For Entry of Default

4. That I sent them my loan agreement, tax forms, social security number, and everything they could possibly need, and I never even got a response.

5. That I am a single mother who had been cleaning homes for five years now and when Covid-19 started it impacted me and I had to apply for an SBA loan.

6. That my SBA loan was granted but PayPal ended up seizing the money.

7. That I lost my home and vehicle due to PayPal taking my money.

8. That due to PayPal taking my money I ended up having to live in a motel with my one-year-old daughter at the time.

I declare under penalty of perjury under the laws of the State of California and under the laws of the United States of America that the foregoing is true and correct.

Executed this 18th day of April 2022, at Beverly Hills, California

/s *Ashley Casey*

Ashley Casey

Eric Bensamochan, Esq. SBN255482
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**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

LENA EVANS, RONI SHEMTOV, and
SHBADAN AKYLBEKOV, individually and
on behalf of all others similarly situated,

Plaintiffs,

V.

PAYPAL, INC., a Delaware Corporation; and
DOES 1-25, inclusive,

Defendants.

Case No.: 5:22-cv-00248

DECLARATION OF BRETT JUNG

I, Brett Jung, do hereby declare that all of the following is true and correct to the best of my personal knowledge and if called upon as a witness I could and would competently testify to the truthfulness of all of the below statements.

1. I am a PayPal Customer who trusted PayPal to securely hold money in my account.
 2. That I used my PayPal account to hold my money from my online business.
 3. That I used my PayPal account to resell virtual items.
 4. That on July 13th, 2021, my PayPal funds were seized.

5. That I contacted PayPal and submitted a complaint with the Better Business Bureau.

6. That I am a student.

7. That it took me over a year to obtain that money from reselling virtual goods.

8. That I need the money for college, and it is putting me in a stressful financial situation.

9. That \$19,041.15 was frozen on my account.

I declare under penalty of perjury under the laws of the State of California and under the laws of the United States of America that the forgoing is true and correct. Executed this 20th day of April 2022, at Beverly Hills, California.

By:  Brett Jung
09F2118D676149D...

Eric Bensamochan, Esq. SBN255482
The Bensamochan Law Firm, Inc.
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**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

LENA EVANS, RONI SHEMTOV, and
SHBADAN AKYLBEKOV, individually and
on behalf of all others similarly situated,

Plaintiffs,

V.

PAYPAL,INC., a Delaware Corporation; and
DOES 1-25, inclusive,

Defendants.

Case No.: 5:22-cv-00248

DECLARATION OF MUHAMMAD SOHAIL SHAMIM MIRZA

I, Muhammad Sohail Shamim Mirza do hereby declare that all of the following is true and correct to the best of my personal knowledge and if called upon as a witness I could and would competently testify to the truthfulness of all of the below statements.

1. I am a medical graduate doctor and part time Uber/Lyft driver who is now going through licensing exams to get certified.

2. I am married, and have a 6 month year old little girl, but my wife is not in the United States .

1 3. I am a PayPal Customer who trusted PayPal to securely hold Money in my
2 account.

3 4. That PayPal froze, restricted, and set limitations on my account seizing \$3,300.00
4 on March 8, 2021

5 5. That I called them many times and tried to speak with their customer service and
6 requested to be allowed to use my funds but that was never granted. I was asked to wait for 180
7 days, but my money was seized with no explanation, even when I questioned them about it.

8 6. That on August 23, 2021, I got an email that my funds were eligible for
9 withdrawal, but even then, I was not allowed to withdrawal all my funds at once.

10 7. That every time that they've allowed me to withdraw some funds, they will also
11 seize the funds again.

12 8. Even after I moved all my funds, they closed my account and will not let me login
13 nor access my account anymore.

14 I declare under penalty of perjury under the laws of the State of California and under the
15 laws of the United States of America that the foregoing is true and correct. Executed this 20th day
16 of April 2022, at Beverly Hills, California.

17 By: 
18 Muhammad Sohail Shamim
19 Mirza

1 Eric Bensamochan, Esq. SBN255482
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UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

9
10 LENA EVANS, RONI SHEMTOV, and
11 SHBADAN AKYLBEEKOV, individually and
on behalf of all others similarly situated,

12 Plaintiffs,

13 v.

14 PAYPAL, INC., a Delaware Corporation; and
15 DOES 1-25, inclusive,

16 Defendants.

Case No.: 5:22-cv-00248

DECLARATION OF ERIC LARSON

19 I, Eric Larson, do hereby declare that all of the following is true and correct to the best of
20 my personal knowledge and if called upon as a witness I could and would competently testify to
21 the truthfulness of all of the below statements.

22 1. I am a PayPal Customer who trusted PayPal to securely hold money in my
23 account.

24 2. That I operate a retail sporting goods store catering to Law enforcement and
25 military professionals getting the gear they need to do their job safely

28 Declaration

- 1 -

3. That we are a brick-and-mortar store, and I have 3 employees along with my wife. We have twin daughters, and this is our sole source of income to provide for our family. I am a Castaic town council member and a former United States Marine Sergeant having served in Desert Storm. I started this company so I could help my fellow brothers and sisters in arms get the gear they needed to come home alive.

4. That on August 4th PayPal seized \$3587.87 from my account.

5. That both, my wife Kim and I, been calling since the funds were seized 180 days ago. I called back in July to make sure we would get our funds and was told on August 10th the funds would be available to transfer.

6. That Kim called on August 5th when I discovered the account was empty and spoke to someone named "Daniel" and he assured me that the funds would be in our account to transfer to my bank

7. That Kim called on August 10th and spoke to someone named "Jane" and she said I will never get my funds as they are to pay for damages and to pay the government for the user agreement we did not adhere to. "Jane" said I was told wrong information previously. I only bought dog beds and other items, but did not break their user agreement. I were never told that I broke their user agreement. "Jane" stated I would never get my money.

8. That I then asked for the manager, and spoke to someone named "Jason". He again said I violated the user agreement and will not get me my money. I stressed to them that I needed my money released and then he said that \$2,500 will be taken out for the violation. I was originally told that PayPal kept my money due to the potential of chargebacks, and never was informed that I broke the rules. "Jason" told me to seek outside options to get my money back.

9. That I am a disabled veteran that owns a small business who has been hit hard by Covid-19, who did not get any PPP, and I need this money to pay rent.

1 I declare under penalty of perjury under the laws of the State of California and under the
2 laws of the United States of America that the foregoing is true and correct. Executed this 20th day
3 of April 2022, at Beverly Hills, California.

4
5 By: 
Eric Larson

Eric Bensamochan, Esq. SBN255482
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Plaintiffs,

V.

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Defendants.

Case No.: 5:22-cv-00248

DECLARATION OF ANDREW NEMESH

I, Andrew Nemesh, do hereby declare that all of the following is true and correct to the best of my personal knowledge and if called upon as a witness I could and would competently testify to the truthfulness of all of the below statements.

1. I am a PayPal Customer who trusted PayPal to securely hold money in my account.

2. That I used my PayPal account to sell sporting goods on my website Gunbroker.com.

10 of 10

3. That on May 07, 2021, my PayPal account was limited.

4. That I called support when I first noticed the limitations on my account and talked with a PayPal agent.

5. That I gave them the Tracking numbers for the recent sales and Gunbroker.com invoices to unlock my ability to withdraw my balance.

6. That I supplied the shipping information and Gunbroker.com invoices to PayPal.

7. That the agent over the phone told me everything looked good, and that I can continue to send invoices and we will still process them for you.

8. That I processed 7 invoices from 05/07/2021 2:45pm to 05/10/2021 9:47am before they completely locked my account with a \$1,374.14 balance. They messaged me that I am in violation of terms of use, and I have to wait 180 days before it will be released to me.

9. That I called and kept being put on hold for hours. I was unable to get a hold of anyone in management and the call center workers could not help with info on my case or in any other capacity. Every time I was transferred to a manager, they would ignore the call.

10. That I called support and messaged them via Paypal.com with no reply on the message or with the call. They said I could appeal the seizure, but will not receive the money seized.

11. That \$1,374.14 was taken from my PayPal account and never returned.

12. That I was never given a copy or any investigation report or finding.

13. That I support myself and my parents who are receiving cancer treatment through my online sales business, and PayPal's seizure of my money made it extremely difficult to survive.

I declare under penalty of perjury under the laws of the State of California and under the laws of the United States of America that the forgoing is true and correct. Executed this 20th day of April 2022, at Beverly Hills, California.

By: Andrew Nemesh
Andrew Nemesh

Eric Bensamochan, Esq. SBN255482
The Bensamochan Law Firm, Inc.
9025 Wilshire Blvd., Suite 215
Beverly Hills, CA 90211
Tel: (818) 574-5740
Fax: (818) 961-0138
Email: eric@eblawfirm.us

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

LENA EVANS, RONI SHEMTOV, and
SHBADAN AKYLBEKOV, individually and
on behalf of all others similarly situated,

Plaintiffs,

V.

PAYPAL, INC., a Delaware Corporation; and
DOES 1-25, inclusive,

Defendants.

Case No.: 5:22-cv-00248

DECLARATION OF MATHEW EBORA

I, Mathew Ebora, do hereby declare that all of the following is true and correct to the best of my personal knowledge and if called upon as a witness I could and would competently testify to the truthfulness of all of the below statements.

1. I am a PayPal Customer who trusted PayPal to securely hold money in my account.

2. That I used my PayPal account to hold my money from my part-time job as a freelancer and some investments in other businesses.

3. That on October 19, 2021, my PayPal funds were seized.

4. That I contacted their customer support however I was passed around numerous times and was told that my reason is not worthy therefore they rejected my appeal and the documents that I sent them. Then after that I tried emailing them yet, there was no response at all. The day after that I wrote a complaint to the Better Business Bureau against PayPal still days passed by and there's no response or notification from the Better Business Bureau.

5. That I am a college student.

6. That my family never had much, and we were relying on relatives because my mom and dad can't make ends meet.

7. That before PayPal stole my money, I was doing great and was able to help my father and mother, unfortunately that did not last long because PayPal froze the money I earned.

8. That I have yet to receive my seized funds of \$2,791.23 or 141,509.98 PhP
I declare under penalty of perjury under the laws of the State of California and under the
laws of the United States of America that the forgoing is true and correct. Executed this 20th day
of April 2022, at Beverly Hills, California.

DocuSigned by:

By: [DD8C455023174CF](#)
Mathew Ebora